

### REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed June 15, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

#### **I. Claim Rejections - 35 U.S.C. § 102(b)**

Claims 1-5, 8, 11, 16-18, 21, 22, 24-27, and 29 have been rejected under 35 U.S.C. § 102(b) as being anticipated by *Chong* (U.S. Pat. No. 5,175,684). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the *Chong* reference. Applicant discusses the *Chong* reference and Applicant's claims in the following.

Applicant's independent claim 1 provides as follows (emphasis added):

1. A method for facilitating generation of a hard copy, comprising:
  - selecting a document file written in a first language;
  - selecting a translator file configured to translate the document file into a second language; and
  - packaging the document file and the translator file together in a job package that can be received by a hard copy generation device.***

Regarding the limitations of claim 1, *Chong* at least does not teach "packaging the document file and the translator file together in a job package that can be received by a hard copy generation device." Instead, *Chong* teaches:

The input data faxed, scanned, or transmitted to the computer server system 10 are converted into system data and input text data using a character recognition program. For scanned or faxed input, optical character recognition (OCR) programs are widely available and their operation is well known in this field. . . . The OCR program is used to recognize text pages of the input data as input text, and is also programmed or customized to recognize system information designated in certain fields of a cover page of the input data. The OCR program is preferably resident as an application program in the server computer system 10.

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Referring to FIG. 2, the server system 10 receives input data which is divided into a number of pages. One input page is a cover page 50 having a number of fields containing language selection, page format selection, and addressee routing information used by the system. In the invention, the cover page has a predefined format which is recognized by the recognition module 12 of the computer server system 10 so that the system information in the predefined fields can be readily determined. . . . Boxes 53, which can be marked or blackened in, allow the selected source and target languages, correspondence type (sublanguage), and output page format to be determined without error. . . . Alternatively, the selection, command, and addressee information of the cover page and the text pages for an electronic text transmission may be defined by a predetermined coding or indexing.

...

The machine translation module and submodules 20 may be incorporated in the server computer system 10 or in a separate translation processing system. . . . The machine translation module 20 is configured as a separate module which receives command data designating the source and target language pair and sublanguage, if any, and the text data from the computer server system 10. In this manner, the machine translation program(s) is(are) kept separate from the recognition, page formatting, and routing functions of the computer server 10 so that they can be easily upgraded and/or replaced with enhanced programs without disruption to the remainder of the system. The computer server system acts as a control unit for the machine translation module by selecting the submodule for the language pair

and/or sublanguage to be used according to the cover page designations.

Cols. 5-6, lines 39-54 (Emphasis added).

From the above excerpt, it is clear that *Chong* fails to teach "packaging the document file and the translator file together in a job package that can be received by a hard copy generation device," as recited in claim 1. (Emphasis added). Instead, *Chong* only mentions designating a language selection on a cover page of a document. As such, *Chong* does not anticipate each and every limitation of claim 1.

*Chong* is similarly deficient as to Applicant's independent claims 8, 11, and 18, 21, and 24. Those claims respectively require "means for packaging the document file and the translator file together in a job package that can be received by a hard copy generation device," "receiving a job package comprising a document file representing a document, the document file written in a first language, and a translator file configured to translate the document file into a second language," "means for receiving a job package comprising a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language," "receiving an address that identifies the location of a job package that comprises a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language," and "means for receiving an address that identifies the location of a job package that comprises a document file written in a first language and a translator file configured to translate the document file into a second language," which are not suggested or taught by *Chong*.

In view of the foregoing, Applicant respectfully asserts that *Chong* does not anticipate Applicant's independent claims 1, 8, 11, and 18, 21, and 24 and claims 2-5,

16-17, 22, 25-27, and 29 which respectively depend therefrom. Therefore, Applicant respectfully requests that the rejections of these claims be withdrawn.

## **II. Claim Rejections - 35 U.S.C. § 103(a)**

Claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, and 30-32 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Chong* in view of *Adamske* (U.S. Patent No. 6,615,234). Applicant respectfully traverses this rejection.

As is identified above in reference to independent claims 1, 8, 11, 18, and 21 *Chong* does not teach packaging a document file and a translator file together. In that *Adamske* does not remedy this deficiency of the *Chong* reference, Applicant respectfully submits that claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, and 30-32, which depend from claims 1, 8, 11, 18, and 21 are allowable over *Chong* in view of *Adamske* for at least the same reasons that claims 1, 8, 11, 18, and 21 are allowable over *Chong*.

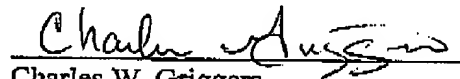
Additionally and notwithstanding the foregoing reasons for the allowability of claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, and 30-32, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

For example, with reference to claim 31, neither *Chong* nor *Adamske* teach or suggest "wherein registering comprises registering with a remote computing device for the purpose of determining whether a total number of hard copies have already been generated and, if so, prohibiting generation of a further hard copy," as recited in the claim. (Emphasis added).

**CONCLUSION**

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

  
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